

EXHIBIT 3

Ryan Cordell

From: Louis F. Teran <lteran@slclg.com>
Sent: Friday, July 12, 2024 6:04 PM
To: Ryan Cordell
Cc: 'Cupar, David B.'; 'Cavanagh, Matthew J.'; Courtney Ervin
Subject: RE: Spectrum v. URZ

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am in receipt of your email below. Just to clarify your comment regarding email passwords, our response to your May 9 letter indicates that the passwords would be provided by URZ's representative directly to your ESI expert on July 8, the day that the imaging was scheduled to take place. This is so because I refused to accept possession or knowledge of URZ's email passwords to pass on to you. I do not want to be responsible for securing said passwords. I wish to prevent said confidential information from being disclosed inadvertently by me or someone in my office. I do not wish to receive said passwords or any passwords so I decided that it would be best for URZ's representative to provide it directly to your ESI vendor in-person, as indicated in my response to your May 9 letter. There is no valid reason for me to be responsible for securing said highly confidential passwords from inadvertent disclosure.

In regard to your July 5 email, the reasons above apply to the passwords you requested. All passwords to devices will be provided directly by the corresponding owners of said devices to your ESI representative in-person. Note that URZ does not own some of these devices so it could not provide the passwords. The passwords will be provided by the corresponding owners of the devices directly to your ESI vendor in person upon imaging. In regard to the technical specifications, as I explained previously, neither URZ nor its representative are computer experts by any stretch of the imagination. URZ would not know where to look to attain the specific technical information you request. Nevertheless, the devices will be made available to your ESI vendor who, I'm sure will be able to attain such information easily from the devices themselves or through other means

In regard to the state of URZ's electricity, I am not certain whether the electricity and internet at URZ's facility is currently operable and reliable. As I indicated in various prior emails, the main representative of URZ was scheduled to leave on vacation out of the country on July 10 or 11. Thus, I have not yet been able to reach him since yesterday. As I stated in prior emails, he is scheduled to return on August 4 (I believe, please refer to my prior email with exact dates). I will continue to reach him to learn about the reliability of the electricity and internet at URZ's facility. I will let you know as soon as I hear anything.

In regard to your comment that the hurricane prevented the collection on Monday, July 8, it is my understanding from prior emails that it was not just the hurricane. I believe your ESI vendor suffered damage that prevented him from imaging URZ's devices for the entire week of July 8, not just Monday. Please confirm that such was the case.

Regardless, URZ has no desire in failing to comply with or disobeying the Court's Discovery Order. URZ will allow your ESI vendor to image its ESI devices and emails as required by the Court's Order. The only problem at this point is scheduling which has been complicated by the storm, the damages suffered by your ESI vendor due to the storm, and the pre-planned vacation schedules of URZ's main representative and myself. Despite these complications, URZ will make its ESI assets available for imaging as soon as practicable.

To that extent, as I indicated in various prior emails, I will be on vacation out of the country starting this weekend. However, I am scheduled to return to the country at the end of July. But I am not scheduled to be back in the office until August 18, if possible. Thus, if necessary, I will continue my efforts to connect with URZ's main

representative while I am out of the country to get more information. However, he is scheduled to be back on August 4. So, I will likely be able to connect with him and coordinate the ESI imaging better within him upon his return. Besides, by all indications based on the limited information that I have here in Los Angeles, the electricity and internet reliability in Houston will not be fully available for another couple of weeks.

Nevertheless, I will continue to work on this with URZ until the last remaining section of the Court's Discovery Order is completed.

Feel free to contact me with any comments or questions.

Thank you

Louis F. Teran

Attorney at Law

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From: Ryan Cordell <rcordell@hicks-thomas.com>

Sent: Thursday, July 11, 2024 11:45 AM

To: Louis F. Teran <lteran@slclg.com>

Cc: 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>; 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>; Courtney Ervin <cervin@hicks-thomas.com>

Subject: RE: Spectrum v. URZ

Louis,

Based on URZ's response to Spectrum's May 9 letter, dated July 3, 2024, URZ still has not provided the passwords for each email account. These accounts may be accessed and imaged remotely, provided Spectrum's vendor has the passwords.

URZ has also failed to provide the information requested by Spectrum's July 5 email, including (1) the hard drive sizes for each computer, (2) the operating systems of each computer, (3) PIN codes, passwords, encryption keys, (4) administrator usernames and (5) passwords for each computer and phone to be imaged. The hard drive sizes and operating systems are requested so that Spectrum's vendor knows what equipment to bring to perform the collection and to properly estimate the time for imaging. Please provide this information at least 24 hours prior to the onsite inspection. Spectrum is more than willing (as we have

previously offered), to connect our ESI vendor with your client to explain to them how to obtain this information.

Please let us know when URZ has reliable power and electricity and electricity at the site of the collection, and dates for the inspection to take place within 72 hours of restoration. We are also monitoring the power outage map.

As to your statements regarding the cause of the delay and upcoming vacations, this collection should have occurred long before the hurricane and summer vacations. While the storm prevented any collection from taking place on Monday, July 8, it remains Spectrum's position that URZ has needlessly delayed and complicated this process.

As to your question as to whether any imaging has occurred, it has not because the hurricane prevented the collection on Monday, July 8.

Thank you,



D. Ryan Cordell, Jr.

Associate

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From: Louis F. Teran <lteran@slclg.com>

Sent: Wednesday, July 10, 2024 5:39 PM

To: Courtney Ervin <cervin@hicks-thomas.com>

Cc: Ryan Cordell <rcordell@hicks-thomas.com>; 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>; 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>

Subject: RE: Spectrum v. URZ

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I am in receipt of your email below. I am sorry to hear about the storm but I am glad you and Aaron made it through safely. Just a point of clarification to your email, URZ has provided full responses to the May 9 letter last week. Please refer to the email from Ryan Cordell dated July 5, 2024. Also, I know that things have been rough in Houston due to the storm. I believe that my client has been without electricity and internet connection for several days.

But, pursuant to your email, I will contact my client to see if their electricity and/or internet connection is back up and running reliably. Also, as we indicated several times before, the main representative of URZ was expected to

travel out of the country on July 10 or 11. In addition, I am scheduled to travel out of the country this weekend. My travel plans have not changed but I am not sure if the travel plans of URZ's representative has changed due to the storm. I will reach out and get this information. Nevertheless, the travel plans may cause some disruption or delay in this process but we will do our best to work around the issues as promptly as possible.

Finally, just to understand the status of URZ's compliance with the Court's Order, can you confirm the following: URZ has complied with section 2 and 3 of the Court's Order as it provided all records and bank account information. In addition, URZ has complied with section 4 as it made its facility available for physical inspection. However, section 1 is still pending primarily due to damage suffered by your ESI vendor caused by the storm. Was your ESI vendor able to image any of the devices or do all the devices still need imaging?

I should have some information on the status of my client by tomorrow. Please be mindful that there is a time difference between me and my client as I am in Los Angeles (PST). Feel free to contact me with any comments or questions.

Thank you

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From: Courtney Ervin <cervin@hicks-thomas.com>

Sent: Tuesday, July 9, 2024 3:49 PM

To: Louis F. Teran <lteran@slclg.com>

Cc: Ryan Cordell <rcordell@hicks-thomas.com>; Cupar, David B. <dcupar@mcdonaldhopkins.com>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>

Subject: RE: Spectrum v. URZ

Our e-discovery vendor, Aaron Hughes with Vidoc Razor, lives in an area of town heavily impacted by Hurricane Beryl. As a result, the earliest that he is available to conduct the collection is July 12. That collection is contingent upon URZ's confirmation that Aaron will have reliable power and internet connectivity for the full duration of the collection. Because URZ has failed to provide the information requested in Spectrum's May 9 letter, we cannot estimate for you the time the collection will take. It continues to be Spectrum's position that a call with a person at URZ knowledgeable about the systems and Aaron Hughes prior

to the collection is essential to allow for an efficient collection. I don't understand why URZ refuses to do this, but if you have changed your mind, please provide us some dates and time for this call tomorrow or Thursday.

Please confirm that the collection can take place July 12 or provide us with alternative dates the week of July 15. Spectrum is offering the week of July 15 as a courtesy because of the hurricane, but please be aware that URZ's failure to cooperate with Spectrum to permit the orderly and efficient collection of the data, including not responding to the May 9 letter and not participating in a conference call with Aaron July 1, 2 or July 5, is the reason this data has not already been collected as has been repeatedly ordered by the Court.

I have also attached the signed protective order by Mr. Hughes.

I look forward to your response.

From: Courtney Ervin

Sent: Monday, July 8, 2024 12:23 PM

To: Louis F. Teran <lteran@slclg.com>

Cc: Ryan Cordell <rcordell@hicks-thomas.com>; Cupar, David B. <dcupar@mcdonaldhopkins.com>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>

Subject: Re: Spectrum v. URZ

Louis,

Due to Hurricane Beryl, which is still battering Houston, the forensic imaging scheduled for tonight will have to be rescheduled. Our forensic vendor suffered property damage, as have I. The streets are not passable because of flooding and downed trees. Further, power and internet is out or unreliable across the city. Reliable power and internet are a requirement to a successful imaging.

I'm hopeful we can get back in our tomorrow and we can discuss an alternative date.

Best regards,

Courtney

Sent from my iPhone

On Jul 8, 2024, at 12:14 PM, Louis F. Teran <lteran@slclg.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Cupar and Mr. Cordell,

I have just received confirmation from URZ that everything is set for today at 6pm (Houston Time). Pursuant to the Court's Order and the emails below, URZ will make its facility and ESI sources available for physical inspection and imaging. Please send me the Exhibit A of the Protective Order signed by all persons that will participate in this process. Feel free to contact me with any comments or questions.

Thank you

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From: Louis F. Teran <lteran@slclg.com>
Sent: Friday, July 5, 2024 1:31 PM
To: 'Ryan Cordell' <rcordell@hicks-thomas.com>
Cc: 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>; 'Courtney Ervin' <cervin@hicks-thomas.com>; 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>
Subject: RE: Spectrum v. URZ

I am in receipt of your email below and your voicemail. URZ has just confirmed that it is ready for the inspection and ESI imaging to take place pursuant to the Court's Order on Monday, July 8, 2024 at 6 pm, as I indicated in my prior email. All the devices will be made available at that time along with all passwords, pins, or anything else needed for full access. As was previously discussed, the ESI imaging or collection must be done on-site. The devices cannot be removed from the site. Your ESI vendor will be able to stay there for as long as it takes to complete the imaging process. Since this will take place after business hours, there is no preference on which device to image first. Your ESI vendor can choose how to proceed with imaging. In addition, as required by the Court order, the facility will be available for physical inspection as well.

It is important to note that this entire process must be treated as HIGHLY CONFIDENTIAL pursuant to the Protective Order. I will need the signed Exhibit A from all the individuals that will be present or participate in this process.

Specific information regarding the devices will be provided on-site to the best of URZ's ability. Note that URZ is not an expert on these devices and may not know details of Operating System or size of hard drives. However, the devices will be made available and accessible for your ESI vendor to do its job.

I hope this addresses all the pending issues. Feel free to contact me with any comments or questions.

Thank you

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From: Ryan Cordell <rcordell@hicks-thomas.com>
Sent: Friday, July 5, 2024 7:16 AM
To: Louis F. Teran <lteran@slclg.com>
Cc: Cupar, David B. <dcupar@mcdonaldhopkins.com>; Courtney Ervin <cervin@hicks-thomas.com>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>
Subject: Spectrum v. URZ

Mr. Teran,

Thank you for providing the information requested in our May 9 Letter, and making URZ's facility and ESI available on Monday.

We will also need the following information to gather the ESI from the devices:

1. Hard Drive size for each computer – needed to estimate how long imaging of each computer will take
2. Operating System (OS) for each computer – needed to determine correct tools to take image
3. All access information including passwords, encryption keys, and PIN codes for each phone – needed to access the devices
4. All access information including usernames, passwords, encryption keys, administrator usernames and passwords for each computer – needed to access the devices

We would like to have a call with you today to talk over some details to ensure this process goes smoothly and efficiently. **Can you please advise of your availability today?** We would like to discuss topics such as the following:

1. Minimizing business disruption and device preference – for example, does URZ require that the computer acting as the server be imaged first so it can be back up and running as soon as possible? Would URZ prefer that we image the cell phones first so they can be returned to their owners?
2. Coordination – for example, whether URZ prefers Spectrum's vendor to perform the ESI collection on-site, or whether URZ will let Spectrum's vendor take the devices back to his office for overnight processing and re-delivery when complete. Similarly, if collection

is to be performed on-site, our vendor will need a suitable space to perform the work and power.

3. Estimated timing and duration of the collection, which will depend on the size of the devices and location where the ESI is collected.

Thank you,

<image002.png>

D. Ryan Cordell, Jr.

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